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Counsel for E. Lynn Schoenmann,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PETER R. FADER
dba Urchin Capital Partners
dba Urchin Partners LLC,

Debtor.

Case No.: 08-30119-DM

Chapter 7

**CHAPTER 7 TRUSTEE'S MOTION
FOR ORDER AUTHORIZING
PAYMENT OF ESTATE'S POST-
PETITION TAX OBLIGATIONS**

Hearing Date

Date: November 15, 2022

Time: 11:30 a.m.

Place: Courtcall/Videoconference

Judge: Honorable Dennis Montali

E. Lynn Schoenmann, the duly appointed trustee ("Trustee") of the chapter 7 estate of Peter R. Fader, moves (the "Motion") pursuant to 11 U.S.C. Section 503(b)(1)(B), for allowance of, and authority to pay, administrative tax claims resulting from a proposed settlement of a lawsuit pending before this Court in Adversary Proceeding No. 20-03007). On October 19, 2022, the Trustee filed a *Motion to Approve Compromise of Adversary Proceeding Against Steven R. Boal and Quotient Technology Pursuant to FRBP* (Dkt No. 100) for authority to settle the estate's claims asserted in that lawsuit for the sum of \$5,000,000 payable in two equal installments of \$2,500,000 each. Upon the estate's receipt of each \$2,500,000 installment, the estate will incur tax obligations that are not anticipated to exceed the following amounts: (a) to the United States Treasury-- \$345,000 for 2022

1 and \$265,000 for 2023; and (b) to the California Franchise Tax Board-- \$128,000 for 2022 and
2 \$106,000 for 2023. The Trustee requests authority to pay these tax obligations in amounts not
3 exceeding these amounts.

4 This Motion is supported by the accompanying Notice of Hearing, the Memorandum of
5 Points and Authorities, the supporting declaration of the Trustee's accountant, Jay Crom of Bachecki
6 Crom and Company, and such other evidence and argument as may be offered at the hearing on this
7 Motion.

8 Dated: October 21, 2022

PACHULSKI STANG ZIEHL & JONES LLP

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10 By: /s/ Miriam Manning
11 Kenneth H. Brown
12 Miriam Manning
13 Counsel for E. Lynn Schoenmann,
14 Chapter 7 Trustee
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